156 Dove Ave.
Tavernier, FL. 33070
7 February 2011

South Atlantic Fishery Management Council
4055 Faber Place, Suite 201
North Charleston, S.C. 29405

Dear Council Member:

During the public hearing in Key Largo on February 3, 2011, a couple of staff members told me that if the Council gave the octocoral (gorgonian) fishery to Florida, or if it did not include State waters in the 50,000 colony ACL, that there would be nothing to prevent overharvesting. Since I strongly disagreed with that opinion, I felt that I needed to write this letter and get it to every Council member before the decision is made.

There are a host of reasons why biological overfishing could not occur. These include the total octocoral population, octocoral biology, the Marine Life Fishery, the fishermen, the equipment, aesthetics, the regulations that Florida has in place, hobbyist demand, and documented harvest data.

TOTAL OCTOCORAL POPULATION

As I have explained in many other letters, there is sufficient information from Florida and Dr. Walter Jaap to estimate the total octocoral population in the Florida Keys (See the letter below). To this total should be added the octocoral populations in the Gulf of Mexico and the East coast of Florida. Otocorals are present on practically all hard bottoms from the shoreline to at least 200 feet deep, even on those with a thin layer of sediment covering the bedrock. In the Gulf of Mexico, there is one species of octocoral that occurs on soft bottom.

Given the values of hard bottom and octocoral densities listed below, a rough estimate of total population of octocorals **in the areas surveyed** can be made:

- 1 hectare = 10,000 square meters.
- Patch reef + outer reef + hardbottom areas = 115,290 hectares = 1,152,900,000 sq. m.
- The “additional information” above lists a mean range of 7 to 25 octocoral colonies present in one square meter of the above areas.
- This means that the total octocoral population is somewhere between 8 billion and 28.8 billion colonies **in the FKNMS and Dry Tortugas National Park areas alone.**

Additional Information

Available habitat: (from 2000 FWRI reef Atlas: Benthic habitats of the Florida Keys, FMRI Tech report TR4 51 pages. FKNMS + Dry Tortugas National Park - provided by Dr. Walt Jaap):

Patch Reef: 3,370 hectares; 8,330 Acres
Outer Reef: 29,550 hectares; 73,010 Acres
Seagrass: 292,520 hectares; 722,840 Acres
Hard bottom: 82,370 hectares; 203,540 Acres
Bare Substrate: 14,820 hectares; 36,630 Acres
Unknown/uninterpreted: 74,170 hectares; 183,270 Acres

Octocoral density: means range from ~7 col/m^2 to ~25 col/m^2. However, these densities include *G. ventalina* which is a prohibited species and is a common gorgonian in the Keys and SE FL. (Vanessa Brinkhuis,FWRI).

Species harvested: (provided by Dr. Henry Feddern. Data for 2008)

Rank	# Sold	Species	Waters	Habitat	Bottom Type	Depth (ft)	Dist. from Shore
1	2409	*Diodogorgia nodulifera*	State	SE Florida	bedrock ridge	70-100	1 Mile
2	1855	*Muriceopsis flavida*	State	Upper Keys	bedrock & patch reef	10-15	1-2 Miles
3	1816	*Swiftia exserta*	State	SE Florida	bedrock ridge	60-90	1 Mile
4	1568	*Pseudopterogorgia elizabethii*	Federal	Upper Keys	forereef	50-80	3.5 Miles
5	1175	*Muricea sp.*	State	Upper Keys	smooth bedrock	10-15	0.5-1 Mile
6	1003	*Pseudopterogorgia sp.*	State	Upper Keys	smooth bedrock	3-15	Shore to 1 Mile
7	964	*Pseudopterogorgia sp.*	State	Upper Keys	patch reef	10-15	1-2 Miles
8	823	*Plexaurella sp.*	State	Upper Keys	smooth bedrock	10-15	0.5-1 Mile
9	739	*Pterogorgia anceps*	State	Upper Keys	smooth bedrock	3-10	Shore to 0.5 Mile
10	659	*Pterogorgia citrina*	State	Upper Keys	smooth bedrock	10-20	1-2 Miles

Top 3 species are not some of the more common species recorded in the field because they are deeper species. These deeper species are more colorful (reds and orange) than some shallow water species(Vanessa Brinkhuis,FWRI).

Henry Feddern

From: Walt Jaap [wjaap@tampabay.rr.com]
Sent: Monday, September 28, 2009 9:59 AM
To: 'Henry Feddern'
Subject: RE: habitat maps
Attachments: Jaap_Final.pdf

Hello Henry:

Good to hear from you. I am pleased to give you a hand and try to assist in figuring a number for the habitat and extrapolating or estimating number of individual colonies based on density measurements from sampling sites in the Keys. As a preface, let me acknowledge that since the 1984 review article was published there are additional publications that may aid you in your task. I am attaching a PDF from the book USA coral reefs, the chapter on the Keys may provide you with additional octocoral density data. As an example, at Pulaski Shoal, we counted 15.50 (plus or minus 3.5) species per sq m and 92.60 (plus or minus 31.74) colonies of octocorals per sq m. This is a high value as Pulaski is an octocoral jungle. Plus or minus is one standard deviation from the mean or average

In the context of better or more comprehensive habitat maps- FKMS has expended lots of $$ and effort on habitat maps. You might contact the sanctuary or FWRI GIS program (Henry Norris) to see what their most recent estimates for hard bottom are. USGS also has some comprehensive maps of the Keys. Barbara Lidz may be a good contact to get copies of their maps.

I have a copy of a 2000 FWRI reef Atlas: Benthic habitats of the Florida Keys, FMRI Tech report TR4 51 pages. They summarize the habitat, FKNMS + Dry Tortugas National Park):

Patch Reef: 3,370 hectares, 8,330 Acres
Outer Reef: 29,550 hectares, 73,010 Acres
Seagrass: 292,520 hectares, 722,840 Acres
Hard bottom: 82,370 hectares, 203,540 Acres
Bare Substrate: 14,820 hectares, 36,630 Acres
Unknown/uninterpreted: 74,170 hectares, 183,270

At the time the above were mapped, the unknown was mostly the area between Key West and Dry Tortugas.

You may be able to get the 1984 Ecology of the South Florida Coral Reefs as an HTML file at:

USGS National Wetlands Research Center: Publications - **Community ...**
Aug 12, 2008 **... Jaap, W.C. 1984. The ecology of the south Florida coral reefs: a community profile**. U.S. Fish and Wildlife Service Biological Services ...
www.nwrc.usgs.gov/publications/commprof.htm - Cached - Similar

Hope this helps

Walter C. Jaap
Lithophyte Research- Team W

MY OWN COUNTS

Because most octocoral counts by scientists only counted total colonies without regard to species, I did a series of counts that separated the species in which we are interested. Also, I counted colonies of ALL sizes (no researcher plainly said whether he counted all colonies or just the large ones.) Counting all of them is difficult because the eye becomes focused on a large one and doesn't immediately see all the tiny babies on the substrate below it. I sent these counts to the SSC. I counted 2424 colonies in 124 one-square-meter sets, averaging about 20 colonies per square meter. I can email the detailed information to you if you are interested.

AREAS THAT ARE NOT HARVESTED

Since it is not economically feasible to dive for octocorals below 100 feet because of diver decompression limits, there is no octocoral harvest there. In addition, harvesting is prohibited in the Key Largo National Marine Sanctuary, in SPA (Sanctuary Preservation Area) areas of the Florida Keys National Marine Sanctuary, in Dry Tortugas National Park, in Everglades National Park, and in Biscayne Bay National Park. This means that octocorals are already totally protected in the majority of South Florida state and EEZ waters.

OCTOCORAL BIOLOGY

The scientific information I supplied to the SSC clearly shows that octocorals possess a variety of reproductive methods, colonize bare areas quickly, grow rapidly, and have a relatively short lifespan. In addition, they produce chemicals within their tissues that prevent them from being used by other organisms for food. Because of these traits, they rapidly replace the colonies harvested.

MARINE LIFE FISHERY

The marine life fishery consists of a huge number of species ranging from algae to invertebrates to fishes. Octocorals comprise only a very small portion of this list, which is reproduced on the nest page.

MARINE LIFE FISHERMEN

I am about the only fisherman who specializes in octocorals. The vast majority of the others either do not harvest octocorals or harvest only a relative few. Most of the organisms listed below, including octocorals, are harvested by snorkel or SCUBA, ONE BY ONE. As a result, a fisherman must decide how to spend his limited time to harvest the organisms that will best fill his orders. From experience, it is not possible to harvest octocorals and at the same time harvest fish, for instance. The reason is that each type of organism requires different types of collecting equipment, and trying to carry both types of equipment at the same time is too awkward and reduces diver safety. When I collect for a full day, I have to go from habitat to habitat to collect the full range of organisms that I need for an order. I usually need several days to fill a particular order. The maximum number of SCUBA tanks I have ever used in a day was 4. Usually I use 2 or 3. This means that my total harvesting time (using 3 tanks) is about 3.5 hours for the day. This diving can be done only during good weather with reasonable water visibility.

Diving is physically-demanding work, and because of time constraints and fatigue, it is usually not feasible to make more than one diving trip in a day.

FLORIDA FISH AND WILDLIFE CONSERVATION COMMISSION
FISH AND WILDLIFE RESEARCH INSTITUTE
MARINE FISHERIES TRIP TICKET

LIST OF MARINE LIFE SPECIES CODES AND NAMES IN ALPHABETICAL ORDER

988		Amphipods/Copepods
707	M	Anemone, banded (=rock)
703	M	Anemone, giant Caribbean (=condylactus)
706	M	Anemone, green colonial (Zoanthus)
708	M	Anemone, other
705	M	Anemone, ringed (=curlique)
701	M	Anemone, sun (=carpet)
704	M	Anemone, sun zoanthid (Palythoa)
702	M	Anemone, white/brown colonial (Palythoa)
503	M	Angelfish, blue
511	M	Angelfish, cherubfish (=pygmy)
505	M	Angelfish, French
501	M	Angelfish, gray (=black)
507	M	Angelfish, queen
509	M	Angelfish, rock beauty
641	**M**	**Balloonfish**
512		Barracuda, great
797	M	Basket star
513	M	Bass, belted sandfish
515	M	Bass, chalk
514	M	Bass, creole-fish
517	M	Bass, harlequin
519	M	Bass, lantern
525	M	Bass, other
521	M	Bass, peppermint (=swissguard)
518	M	Bass, red barbier
913	M	Bass, roughtongue
520	M	Bass, spanish flag
516	M	Bass, threadnose
523	M	Bass, tobaccofish
522	M	Bass, wrasse
912	**M**	**Basslet, candy**
916	**M**	**Basslet, cave**
915	M	Basslet, threeline
596	M	Batfish
887		Bigeye
526	M	Blenny, banded
528	M	Blenny, barred
852	M	Blenny, Florida
530	M	Blenny, glass
532	M	Blenny, hairy
850	M	Blenny, marbled
533	M	Blenny, other
527	M	Blenny, redlip
531	M	Blenny, saddled
529	M	Blenny, sailfin
534	M	Blenny, wrasse
804	M	Brittle star, other
801	M	Brittle star, red serpent
803	M	Brittle star, serpent
799	M	Brittle star, spiny ophiocoma
896	**M**	**Brotula, black (widow)**
907	**M**	**Brotula, key (orange)**
894		**Brotula, other (non-ML)*** **
829		Bryozoa
646	**M**	**Burrfish, spotted**
645	M	Burrfish, striped (=spiny boxfish)
535	M	Butterflyfish, banded
537	M	Butterflyfish, bank
539	M	Butterflyfish, foureye
538	M	Butterflyfish, french
541	M	Butterflyfish, longsnout
552	M	Damselfish, longfin (=honey gregory)
569	M	Damselfish, other
565	M	Damselfish, purple reeffish
561	M	Damselfish, sergeant major
567	M	Damselfish, sunshinefish
557	M	Damselfish, threespot (=orange)
555	M	Damselfish, yellowtail (=jewel)
562	M	Damselfish, yellowtail reeffish
572	M	Drum, cubbyu
571	M	Drum, high-hat
573	M	Drum, jackknife-fish
575	M	Drum, spotted
576		Eel, conger
927	M	Eel, goldspotted
923	M	Eel, sharptail
929	M	Eel, speckled worm
759	M	Fileclam, rough (=flame scallop)
761	M	Fileclam, spiny (=white flame scallop)
895	M	Filefish, orangespotted
590	M	Filefish, other
587	M	Filefish, planehead (=green)
588	M	Filefish, pygmy
586	M	Filefish, scrawled (=blue spot)
589	M	Filefish, whitespotted
591	R	Flounder
593	M	Frogfish, ocellated (=common)
594	M	Frogfish, other
595	M	Frogfish, sargassumfish
925		Gambusia, mangrove
871		Goatfish, other
869		Goatfish, spotted
868		**Goatfish, yellow**
598	M	Goby, naked
597	M	Goby, neon
601	M	Goby, other
599	M	Goby, yellowline
731	M	Gorgonian, other
727	M	Gorgonian, red
729	M	Gorgonian, sea blades (=purple)
603	R	Grouper, coney
602	R	Grouper, graysby
898	R	Grouper, other
604	R	Grouper, red hind (=strawberry)
897	R	Grouper, rock hind
605		Grunt, cottonwick
607		Grunt, French
611		Grunt, other (non-ML)***
609	M	Grunt, porkfish
608		Grunt, tomtate
619	M	Hamlet, butter
613	M	Hamlet, butter (=barred)
615	M	Hamlet, butter (=black)
617	M	Hamlet, butter (=blue)
621	M	Hamlet, butter (=indigo)
623	M	Hamlet, butter (=shy)
622	**M**	**Hamlet, mutton**
678	M	Hawkfish, red spotted
627	R	Hogfish, rooster (=hogfish)
629	M	Hogfish, Spanish
625	M	Hogfish, spotfin (=Cuban)
996		Isopod, deepwater (Bathyonomus)
883		Jack, lookdown
697		Ray, lesser electric
694		Ray, other
689	M	Razorfish
853		Remora, other
851		Remora, sharksucker
941		Sand dollar, 5-holed keyhole
943		Sand dollar, 6-holed keyhole
945		Sand dollar, notched
757		Sand dollar, other
841		Scallop, lions-paw
843		Scallop, other
648		Scorpionfish, other
647		Scorpionfish, reef
947		Sea biscuit, flat
946		Sea biscuit, inflated
758		Sea biscuit, other
763	M	Sea cucumber, Florida
764	M	Sea cucumber, other
742	M	Sea Hare
798	M	Sea lilies (Crinoids)
796	M	Sea star, other
793	M	Sea star, red spiny (=common)
649	M	Seahorse, dwarf
651	M	Seahorse, lined (=giant)
891	M	Seahorse, other
877		Searobin
657		Shark, lemon
655		Shark, nurse
656		Shark, other
874	R	Sheepshead
767	M	Shrimp, banded coral (=barber pole)
773	M	Shrimp, cleaner (=scarlet cleaner)
766		Shrimp, mantis
774		Shrimp, other (non-ML)***
770	**M**	**Shrimp, Pederson's cleaner**
769	M	Shrimp, peppermint (=veined)
771	M	Shrimp, pistol or snapping
768	R	Shrimp, rock
765	M	Shrimp, spotted cleaner (=anemone)
732	M	Siphonophores/Hydroids
885		Skate
931	M	Sleepers
964		Snail, bruised nassa
780	**M**	**Snail, cerith**
785		**Snail, chestnut turban**
967		Snail, cone
935	**M**	**Snail, Eastern mud**
969		Snail, fig
777		Snail, flamingo tongue
974		Snail, Florida miter
965		Snail, frogsnail
966		Snail, helmet
972		Snail, marginella
973		Snail, melampus
977		Snail, moon, other
976		Snail, murex
937	**M**	**Snail, Nassarius, other**
978		Snail, nerites
979		Snail, olive
787		Snail, other (non-ML)***
971		Snail, periwinkle
970		Snail, purple sea

(Continued on next page)

545	M	Butterflyfish, spotfin
547	M	Cardinalfish, flamefish
546	M	Cardinalfish, other
548	M	Cardinalfish, two-spot
899		Catfish
985		Chiton
692		Chub, Bermuda
845		Clam, angel wing
847		Clam, jewel box
849		Clam, other
839		Clam, sunray Venus
691	M	Clingfish
654	R	Cobia
959		Conch, Florida crown
951		Conch, Florida fighting
779		Conch, Florida horse
957		Conch, hawkwing
953		Conch, milk
960		Conch, other
832	**M**	**Corallimorph, *Discosoma***
833	**M**	**Corallimorph, other**
831	**M**	**Corallimorph, *Ricordea***
865	M	Cornetfish, blue-spotted
867	M	Cornetfish, red
549	M	Cowfish, honeycomb
550	M	Cowfish, other
690	M	Cowfish, scrawled
776		Cowrie, Atlantic deer
775		Cowrie, measled
718	M	Crab, blue-legged hermit
835		Crab, box (=flame)
834	**M**	**Crab, clinging reef (*M. ruber*)**
838		**Crab, clinging reef, other (non-ML)*** **
987		Crab, coral spider
713	M	Crab, false (=frilly) arrow
904		Crab, fiddler
711	M	Crab, furcate spider (=decorator)
722	**M**	**Crab, giant hermit**
712	**M**	**Crab, green clinging or reef (emerald)**
710	**M**	**Crab, hermit, other**
719		Crab, horseshoe
724		Crab, land hermit
723	M	Crab, nimble spray (=lightfoot, urchin)
725		Crab, other (non-ML)***
714	**M**	**Crab, red banded hermit**
837		Crab, redfinger rubble (=calico)
716	**M**	**Crab, red-legged (scarlet) hermit**
836	**M**	**Crab, red-ridged clinging**
721	M	Crab, spotted porcelain
720	**M**	**Crab, stareye hermit**
715	M	Crab, thinstripe (=green-striped) hermi
717	**M**	**Crab, white operculate (polkadot)**
726	**M**	**Crab, white speckled hermit**
709	M	Crab, yellowline arrow
917	M	Croaker, reef
893		Cusk-eel
551	M	Damselfish, beaugregory
553	M	Damselfish, bicolor
563	M	Damselfish, blue chromis (=blue reef)
564	M	Damselfish, brown chromis (=brown reef)
560	M	Damselfish, cocoa
559	M	Damselfish, dusky (=scarletback)
631	M	Jawfish, dusky
632	M	Jawfish, other
630	M	Jawfish, spotfin
633	M	Jawfish, yellowhead
734		Jellyfish, other (non-ML)***
733	M	Jellyfish, upside-down
812		**Live rock (pounds)***
827		Live sand
693		Lizardfish, inshore
735	R	Lobster, Caribbean spiny (=rock)
737		Lobster, Spanish slipper (=shovelnose)
736		Lobster, spotted
999		Miscellaneous fishes
998		Miscellaneous invertebrates
854		Mojarra
577	M	Moray, blackedge (=chain)
583	M	Moray, goldentail
579	M	Moray, green
585	M	Moray, other
581	M	Moray, spotted
997		**Non-native species**
740	M	Nudibranch, FL regal doris (=Greek godd
739	M	Nudibranch, lettuce sea slug (=fancy)
741	M	Nudibranch, other
745	M	Octopus, Atlantic pygmy (=dwarf)
744	M	Octopus, Caribbean reef
743		Octopus, common
746	M	Octopus, white-spotted
747		Oyster, Atlantic thorny- (=spiny)
635	M	Parrotfish, blue
890	M	Parrotfish, midnight
639	M	Parrotfish, other
892	M	Parrotfish, princess
638	M	Parrotfish, queen
636	M	Parrotfish, rainbow
640	M	Parrotfish, redband
634	M	Parrotfish, stoplight
637	M	Parrotfish, striped (=painted)
989		Penshell
872	M	Perch, dwarf sand
873		Perch, sand
884		Pilotfish
652	M	Pipefish, other
653	M	Pipefish, sargassum
749	**M**	**Plant, Caulerpa (gallons)**
754	M	Plant, coralline red algea
751	**M**	**Plant, Halimeda (numbers)**
753	**M**	**Plant, Merman's shaving brush (numbers)**
755		**Plant, non-rooted (gallons)**
752	**M**	**Plant, rooted, other**
993	M	Polychaete, fanworm
994	M	Polychaete, feather-duster
992		Polychaete, fireworm
991	M	Polychaete, horned Christmas-tree
995		Polychaete, other (non-ML)***
644	**M**	**Porcupinefish**
875		Porgy, other**
881		Puffer, other (non-ML)***
643	M	Puffer, sharpnose
642		Puffer, southern
696		Ray, butterfly
698		Ray, eagle
778		Snail, sharkeye (=Atlantic moon)
984	M	Snail, star
986		Snail, tegula
982		Snail, topsnail
980		Snail, triton, angular
981		Snail, triton, other
781		Snail, tulip (=true tulip)
939		**Snail, turbo, other (non-ML)*** **
983		Snail, vase
968		Snail, wentletrap
658	R	Snapper, other
920	R	Snapper, schoolmaster
921	R	Snapper, yellowtail
524	M	Soapfish
659	**M**	**Soldierfish, blackbar**
592		**Sole, zebra (fringed, naked, flabby)**
861		Spadefish, Atlantic
788	**M**	**Sponge, other (ML only)**
792		**Sponge, other (non-ML)*** **
789	M	Sponge, red ball
790	M	Sponge, red finger
791	M	Sponge, red tree
663		Squirrelfish, deepwater
665		Squirrelfish, glasseye snapper
660		Squirrelfish, other
661		Squirrelfish, reef (=common)
859		Stargazer, other
857		Stargazer, southern
699		Stingray, other
688		Stingray, southern
695		Stingray, yellow (=yellow spot)
672	M	Surgeonfish, other
862	M	Sweeper, glassy
667	M	Tang, blue (young are yellow)
669	M	Tang, doctorfish
671	M	Tang, ocean surgeon
856		Tilefish, sand
889	M	Toadfish
673	M	Triggerfish, black durgon
677		Triggerfish, other**
675	M	Triggerfish, queen
855	R	Tripletail
863	M	Trumpetfish
879	M	Trunkfish
878	M	Trunkfish, spotted
830		Tunicates, sea squirts
810	**M**	**Urchin, other**
807	M	Urchin, pencil
806	**M**	**Urchin, purple-spined (*Arbacia*)**
811	**M**	**Urchin, rock-boring (red; *Echinometra*)**
809	M	Urchin, variable or green (pincushion)
961		Whelk, knobbed
963		Whelk, lightning
686	M	Wrasse, blackear
679	M	Wrasse, bluehead
684	M	Wrasse, clown
681	M	Wrasse, creole
687	M	Wrasse, other
685	M	Wrasse, puddingwife
682	M	Wrasse, slippery dick
683	M	Wrasse, yellowhead (=neon)

M - marine life (ML) and restricted species (RS) endorsements required.
R - restricted species (RS) endorsement required.
** gray trigger fish and red porgy restricted; *** for non-restricted species only
These are unofficial designations - please see Florida Administrative Code Chapter 68B-42.

*** - Only aquaculture allowed for live rock**
Text in bold print are new additions/changes

Updated April 8, 2009

BOATS

In order to harvest the range of organisms that a typical order asks for, a fisherman must dive in habitats from near-shore shallow water out to 100 feet depths beyond the reef. This means that the boats are small (typically 20-feet long) so they can go to both these areas and all the areas in between. Since proper care of gorgonians on the boat requires a lot of space, there is a limit to the numbers of gorgonians that can be harvested and cared for during any one trip.

OCTOCORALS SOUGHT AFTER

Octocorals for this fishery need to be harvested uninjured. This is the reason for the small amount of substrate around the base of the octocoral. If the base is not cut, the colony is not

damaged, and the substrate helps to hold the octocoral upright in the aquarium. The octocoral must be of the proper size for the aquarium, and must be aesthetically pleasing. As a result, only a few of the many colonies of the species in an area are harvested, leaving all the others to grow and reproduce. This represents UNDERharvesting within the species on a micro level.

According to Bayer (1961), pg. 323, there about 195 species in the Western Atlantic. Since only a few species are harvested, this means that only a small percentage of the total octocoral species population in any area (which is made up of a variety of species) is sought after, indicating that there is UNDERharvesting on the species level.

FLORIDA'S REGULATIONS

Only about 130 marine life fishermen are allowed to harvest octocorals, and all are required to report their catch, both from State AND Federal waters, on "Trip Tickets" every month. Florida regulates all the organisms caught by the fishermen, monitors the catch, and quickly imposes restrictions on the catch of a particular species if the catch and/or monitoring data warrant restrictions. Florida periodically reviews all these species to ensure that biological overharvesting does not occur. Because Florida understands the size of the octocoral population, it has never needed to further restrict octocoral harvest.

HOBBYIST DEMAND

According to the existing scientific fishery-independent data, harvest of 50,000 colonies per year, when compared with an average estimated octocoral population, shows that this harvest level equals one octocoral colony harvested for every 360,000 colonies present in the Florida Keys. When the populations in the Gulf of Mexico and the east coast of Florida are added in, this percentage harvest is far lower.

Even if the marine aquarium hobby gets 100 times larger, or if demand increases 100 times, that level of harvest is still far below biological overharvesting. This type of increase is not possible. Also, the limited number of fishermen and the time they could devote to octocorals while ignoring the other organisms in their orders, clearly shows that they could not possibly catch that many.

HARVEST DATA

The last 10 years of harvest data clearly show that harvest is NOT controlled by regulations, but by demand from hobbyists. This demand for octocorals has remained relatively stable, even though the harvest in State waters is unlimited. Retaining the status quo or giving the fishery to Florida will not change the demand.

Further restrictions on harvest will damage the fishery if harvest increases only slightly. What will happen then is that a buyer will order from elsewhere in the Caribbean. In order to make a reasonably-sized shipment, he will order many other things at the same time. This buyer may never order from Florida again, thus damaging Florida's fishery and the fisherman's economic livelihood.

CONCLUSIONS

As you can see from the above discussion, there are many independent reasons why octocorals will never be threatened with overharvesting. Each makes it unlikely that biological overharvesting will occur. Combined, they make it impossible for overharvest to ever occur.

Please think about these facets of the Marine Life Fishery, talk to people who have actual experience underwater in Florida's fishery management, Sanctuary personnel, and fishermen. I believe that you will be convinced that overfishing of octocorals will never occur.

If you want to retain octocorals in the Coral Plan, then set the ACL at 50,000 colonies per year from the EEZ only (status quo), and allow Florida to monitor and regulate the octocorals in its waters. If you want to give the fishery to Florida, then the Florida Keys National Sanctuary needs to give its written blessing to the substrate base needed for healthy colonies. Then Florida will continue to monitor and regulate all the octocorals in State and EEZ waters, as well as all the other Marine Life species, as it has been doing successfully for these many decades.

Yours truly,

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